

EXHIBIT B

From: Hughes, John
Sent: Monday, March 16, 2020 5:16 PM
To: Alonzo, Julia D.; Dale, Margaret A.; Pavel, Ashley; Stafford, Laura; McKeen, Elizabeth L.; Friedman, Peter; Mervis, Michael T.; Febus, Chantel L.; Roth, Joseph L.
Cc: Berezin, Robert; Calabrese, Christine; Collins, Reed; Curtin, Thomas; Hall, Jaclyn; Jason Callen; Langley, Adam; Natbony, Bill; Rappoport, Gaspard; Ruocco, Elizabeth; Servais, Casey; Sosland, Martin; Miller, Atara; Paslawsky, Alexandra; Denker, Will; Ohring, Jonathan; Maggio, Kevin; Despina, Luc A.; Bassett, Nicholas; johnmuddlaw@gmail.com
Subject: RE: Ambac 2004 Requests re Cash/Assets
Attachments: Ambac Document Requests re Category No. 1 of Assets Rule 2004 Motion 4833-5535-3271 v.2.docx

Counsel,

I write to follow-up on the February 25, 2020 and March 16, 2020 meet and confers regarding Ambac's Commonwealth Assets and Cash Rule 2004 Requests (the "February 25 Meet and Confer" and "March 16 Meet and Confer"), specifically Category No. 1 (Assets – current and transferred/encumbered) of its Assets Rule 2004 Motion ("Assets Category No. 1").

Assets Category No. 1 covers documents for the Commonwealth's and its instrumentalities' assets, including (without limitation) deeds of sale, details on liens or limitations on such properties (including how such liens or limitations are registered and to whom), titles, assignment agreements, and/or any other documents effectuating any alienation or encumbrance, as well as documents regarding any assessment of the present, future, or contingent value of any such assets, interests therein, and the location thereof. During the February 25 Meet and Confer and March 16 Meet and Confer, AAFAF stated that it objects to a request that it search for and produce information regarding all of the Commonwealth's or its instrumentalities' assets but would be willing to consider requests limited to specific assets. To further these discussions, Ambac has identified a list of assets in the attached document, including properties owned by the Commonwealth or its instrumentalities. Ambac reserves the right to identify certain additional assets or properties, but would appreciate AAFAF's position on this list.

Additionally, in connection with Assets Category No. 1, Ambac respectfully requests documents sufficient to show, from January 1, 2015 to present, any proceeds or revenue derived from ad valorem taxes on any of the Commonwealth's or its instrumentalities' assets, including (without limitation) tax receipts and/or any other documents relating to the levy of such taxes. This request is also described in the attached document.

Ambac looks forward to your response and remains willing to meet and confer on the documents Ambac requests in connection with Assets Category No. 1. Ambac reserves all rights with respect to its other Assets Rule 2004 Requests and its Cash Rule 2004 Requests.

Best,
John

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From: Alonzo, Julia D. <jalonzo@proskauer.com>
Sent: Monday, March 16, 2020 2:25 PM
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**AMBAC ASSURANCE CORPORATION'S DOCUMENT REQUESTS RELATED TO
CATEGORY NO. 1 OF ITS ASSETS RULE 2004 MOTION**

1. Documents sufficient to show, from January 1, 2015 to the present, the alienation or encumbrance of any of the following assets, including (without limitation) deeds of sale, details on liens or limitations on such properties (including how such liens or limitations are registered and to whom), titles, assignment agreements, and/or any other documents effectuating the alienation or encumbrance:

No.	Name / Description of Property	Address / Location (Geolocation Coordinates)	Ownership ¹
1	Vacant land in the Convention District	609 Fernandez Juncos Ave., San Juan (18.456332, -66.087094)	CCDA
2	Land adjacent to San Juan's Piers	302 Fernandez Juncos Ave., San Juan (18.462778, -66.097901)	CCDA
3	Land in front of San Juan's Piers	Pier 10, Fernandez Juncos Ave, San Juan (18.463194, -66.102082)	CCDA
4	Puerto Rico Convention Center	100 Bulevar Saint John, San Juan, 00907, Puerto Rico (18.454112, -66.092104)	CCDA
5	Coliseo de Puerto Rico José Miguel Agrelot	500 Avenida Arterial B, San Juan, 00918, Puerto Rico (18.427904, -66.061333)	CCDA
6	Rivas Domenici Executive Airport	Calle Lindbergh, San Juan, 00901, Puerto Rico (18.456825, -66.098039)	CCDA
7	Land in Metro Area (hosted Leprosy Center)	SR PR-199 y PR-845 Barrio Cuevas, Trujillo Alto (18.361729, -66.027862)	GDB / DRA
8	Land adjacent to HTA's Property in Ponce	PR-14 cor w. Centro Medico Ave., Ponce (18.035824, -66.600516)	GDB

¹ All capitalized terms not defined herein shall have the meanings ascribed to them in *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Assets* (Dkt. No. 9022) (the "Assets Rule 2004 Motion"). "GDB" refers to the Government Development Bank of Puerto Rico. "DRA" refers to the GDB Debt Recovery Authority. "PBA" refers to the Puerto Rico Public Buildings Authority. "PRLA" refers to the Puerto Rico Land Authority. "PRIFA" refers to the Puerto Rico Infrastructure Financing Authority.

No.	Name / Description of Property	Address / Location (Geolocation Coordinates)	Ownership ¹
9	Plaza CCD (vacant land at Convention Center)	Convention Center District, San Juan (18.455754, -66.089418)	GDB
10	Various government buildings next to Hospital	PR-14 cor w. Centro Medico Ave., Ponce (18.033784, -66.590977)	HTA
11	Commercial property leased to U.S. Post Office	Juan Calaf Street, Hato Rey, San Juan (18.427611, -66.069677)	HTA
12	Hato Rey (vacant land in Banking District)	Munoz-Riv Av cor w/ Roosevelt Av, San Juan (18.422679, -66.058400)	HTA
13	Urban Train Former Principal Offices (vacant)	1 Cesar Gonzalez St., Hato Rey, San Juan (18.408436, -66.065445)	HTA
14	HTA's Regional Offices (Mayaguez)	SR 2 Sabalos Ward, Mayaguez (18.172973, -67.151700)	HTA
15	University of P.R. (Mayaguez) - Finca Alzamora	Finca Alzamora, SR 3108 Miradero, Mayaguez (18.217795, -67.147427)	HTA
16	Vacant land close to Pinero Train Station	726 Baldorioty Street, Hato Rey, San Juan (18.408659, -66.054604)	HTA
17	Industrial property in Bairoa Industrial Park	Olimpo St. corner w/ Axtmayer, San Juan (18.261560, -66.037173)	HTA
18	Vacant land close to Martinez Nadal Station	SR 21 Km 3.5, San Juan (18.391926, -66.104887)	HTA
19	PR 52 vacant building near Caguas tollroad	PR 52 North Bound Roadway - Caguas Toll (18.277442, -66.034488)	HTA
20	Hato Rey (Banking District Vacant Land)	Alhambra St. cor w/ Sevilla St, San Juan (18.423675, -66.056544)	HTA
21	Vacant building near Sagrado Corazon Station	1900 Fernandez Juncos Ave., San Juan (18.437467, -66.060794)	HTA
22	Vacant land in Aguadilla	Corazones Ave. Caimital Ward, Aguadilla (18.430749, -67.150517)	HTA
23	HTA's Regional Offices (Manati)	PR 686 cor w/ SR 2, Manati (18.436038, -66.465442)	HTA
24	Vacant land near the corner of Lomas Verdes & Ramirez Ar.	Ramirez Arellano 8 No. 1 Torrimar, Guaynabo (18.384957, -66.116817)	HTA
25	Centro Gubernamental Roberto Sanchez Vilella	De Diego Ave, Stop 22 Santurce, San Juan	PBA

No.	Name / Description of Property	Address / Location (Geolocation Coordinates)	Ownership ¹
		(18.448942, -66.067647)	
26	Treasury Building	10 Paseo Covadonga, San Juan, 00901 (18.465021, -66.109655)	PBA
27	Puerto Rico Police Headquarters in San Juan	Roosevelt Avenue (18.417514, -66.077898)	PBA
28	San Juan Judicial Center - District Court	Munoz Rivera Ave., cor w/ Coll y Toste, Hato Rey (18.412472, -66.056127)	PBA
29	Justice Department	Olimpo St. corner w/ Axtmayer, San Juan (18.456855, -66.086134)	PBA
30	Ponce Judicial Center- District Court	2150 Avenida Santiago de los Caballeros, Ponce (17.991930, -66.604002)	PBA
31	Puerto Rico State Commission on Elections	205, Avenida Arterial B, San Juan (18.428662, -66.063071)	PBA
32	Bayamon Judicial Center – District Court	2399 PR-2, Bayamón (18.395130, -66.149487)	PBA
33	Guayama Judicial Center – District Court	Cll Principal Sur, Guayama (17.971043, -66.114853)	PBA
34	Aguadilla Judicial Center – District Court	70 Calle Progreso, Aguadilla Pueblo, Aguadilla (18.425344, -67.154551)	PBA
35	Former Judicial Center in Caguas	Rafael Cordero Ave. cor w/ Villares, Caguas (18.236357, -66.030809)	PBA
36	Former Judicial Center – District Court	Calle del Carmen Final, Rio Grande (18.377290, -65.838216)	PBA
37	Edificio Loteria de Puerto Rico	Chardon Ave., Hato Rey, San Juan (18.425784, -66.061793)	PBA
38	Catano Fuel Storage	State Road 28 at Pueblo Viejo Ward, Guaynabo (18.421562, -66.105442)	PRLA
39	Hogar del Nino Development in Guaynabo	Frailes Ward in Guaynabo (18.393844, -66.110173)	PRLA
40	Hotel San Felipe, Old San Juan	Beneficiencia Street in Old San Juan (18.467381, -66.120732)	PRLA
41	Vieques Land (Sun Bay Project)	Puerto Real Ward in Vieques (18.105930, -65.463744)	PRLA
42	HTA's Regional Offices (Ponce)	SR 2 Km 222.2 cor w/ SR 591 (17.986806, -66.654374)	PRLA
43	World Plaza Building	268 Av. Luis Muñoz Rivera, San Juan, 00918 (18.424481, -66.058730)	PRIFA

2. Documents sufficient to show, from January 1, 2015 to the present, any assessment of the present, future, or contingent value of any of the assets identified above, interests therein, and the location thereof.

3. Documents sufficient to show, from January 1, 2015 to the present, any proceeds or revenue derived from ad valorem taxes on any of the Commonwealth's or its instrumentalities' assets, including (without limitation) tax receipts and/or any other documents relating to the levy of ad valorem taxes.